

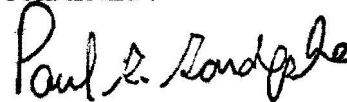
LAW OFFICES OF  
**SCOTT B. TULMAN & ASSOCIATES, PLLC**

THE HELMSLEY BUILDING  
230 PARK AVENUE  
18<sup>TH</sup> FLOOR  
NEW YORK, NEW YORK 10169  
(212) 867-3600  
TELECOPIER: (212) 867-1914  
WWW.TULMANLAW.COM

**MEMO ENDORSED**

The sentencing for defendant Argemiro Zapata-Castro will take place on **July 7, 2021 at 12:00 p.m.** in Courtroom 705 of the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York. Any submissions on behalf of the Defendant are due **June 16, 2021**. Any submission on behalf of the Government is due on **June 23, 2021**.

SO ORDERED.



Paul G. Gardephe  
United States District Judge  
May 4, 2021

May 4, 2021

**BY ECF**

The Honorable Paul G. Gardephe  
United States District Judge  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, New York 10007

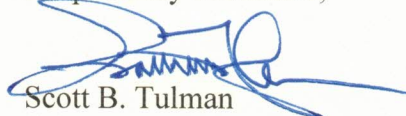
Re: United States v. Argemiro Zapata-Castro  
S1 18 Cr. 601 (PGG)

Dear Judge Gardephe:

I am counsel for Defendant Argemiro Zapata-Castro. Mr. Zapata-Castro is scheduled to be sentenced on May 19, 2021. I write to respectfully request that the sentencing in this matter be adjourned forty-five days, and that the dates for sentencing submissions be adjusted to conform with the new sentencing date. A number of prior adjournments of sentence on consent have been granted based, among other reasons, on my client being severely stricken with COVID-19, and the Court's personally addressing a letter my client wrote to the Court questioning his decision to plead guilty. Mr. Zapata-Castro has been in custody over two years and is facing a mandatory minimum sentence of ten years. The Government consents to this request, as does my client.

The Court issued an Order on April 1, 2021, accepting Mr. Zapata-Castro's guilty plea and scheduling the sentencing for May 19, 2021. (ECF 18Cr601-PGG Doc. No. 446). As the Court is aware, communication with my client has been difficult, but I will soon be in a position to meet with my client in person in the Westchester County Jail with an interpreter to review the sentencing submission, and the detailed facts he seeks to bring to the Court's attention.. I also need to require additional medical information relating to my client's treatment and the lingering impact of COVID-19 on his physical condition. I thank the Court for its consideration of this request.

Respectfully submitted,

  
Scott B. Tulman

SBT:ss  
cc: Matthew Hellman, Esq., AUSA